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August 25, 2014

## VIA ECF

The Honorable Denise L. Cote United States District Judge United States District Court Southern District of New York 500 Pearl Street, Room 1610 New York, NY 10007-1312 OMENT
CORONICALLY
8/26/2014

Re:

FHFA v. HSBC N. Am. Holdings, Inc., 11 Civ. 6189 (DLC); FHFA v. Nomura Holding Am. Inc., No. 11 Civ. 6201 (DLC)

Dear Judge Cote:

We write on behalf of the Plaintiff Federal Housing Finance Agency ("FHFA") regarding proposed redactions to the materials supporting FHFA's Motion for Partial Summary Judgment on the Statute of Limitations (the "Motion"), which will be filed later today in the above-captioned Actions. Because the parties have designated some of the documents filed as exhibits in support of the Motion as "Confidential" under the First Amended Protective Order, and because certain parts of the Motion may contain Non-Party Borrower Information (as defined in paragraph 2.8 of the First Amended Protective Order), FHFA is filing these documents with the Court under seal, pursuant to paragraph 9 of the First Amended Protective Order.

FHFA intends to propose redactions to certain of the materials filed in support of the Motion, and also wishes to give Defendants an opportunity to propose any redactions they think are necessary. To facilitate that process, FHFA respectfully requests that the parties be given until Friday, August 29, 2014, to meet and confer regarding proposed redactions, and that the parties file a joint submission to the Court on Friday, September 5, 2014, listing the proposed redactions to which neither party objects and those to which a party objects. Defendants consent to this proposed schedule.

Thank you for Your Honor's consideration of this submission.

Granked.

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August 26, 2014

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Respectfully submitted,

/s/ Philippe Z. Selendy
Philippe Z. Selendy
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Attorneys for Plaintiff Federal Housing Finance Agency

CC: Counsel of record (via ECF)